

**IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF VIRGINIA  
Alexandria Division**

NORTHSTAR AVIATION L.L.C., <i>et al.</i> ,	)	
	)	
Plaintiffs/Counterclaim Defendants,	)	
	)	
v.	)	C.A. No. 1:18cv-00191-TSE-JFA
	)	
ALDEN BURT DEFENDANT ALBERTO,	)	
a/k/a Reno Defendant Alberto,	)	
	)	
Defendant/Counterclaim Plaintiff.	)	
_____	)	

**PLAINTIFFS'/COUNTERCLAIM DEFENDANTS' MOTION *IN LIMINE* WITH  
RESPECT TO REFLEX RESPONSES MANAGEMENT CONSULTANCY, L.L.C.**

COMES NOW, Plaintiffs/Counterclaim Defendants NorthStar Aviation L.L.C. and NorthStar Aviation USA, LLC (“Plaintiffs”) move the Court *in limine* to preclude Defendant/Counterclaim Plaintiff Alden Burt Defendant Alberto’s (“Defendant”), including Defendant’s attorneys and witnesses, from mentioning or averring to, in the presence of the jury, either directly or indirectly, upon voir dire, statement of the case, interrogation of the witnesses, argument, objections before the jury, or by any other means or manner any of the matters set forth below.

Plaintiffs further request that attorneys be specifically instructed to inform all of Defendant’s witnesses not to volunteer, inject, disclose, state or mention in the presence of the jury any of the matters enumerated below.

Plaintiffs maintain that the following matters are generally inadmissible, irrelevant, and prejudicial to Plaintiffs’ right to a fair and impartial trial. Violation of any or all of these instructions will constitute harm to Plaintiffs and will deprive Plaintiffs of a fair and impartial trial.

Plaintiffs request that the Court instruct all counsel that the failure to abide by such Order of the Court may constitute contempt.

\* \* \* \* \*

1. Documents involving Reflex Responses Management Consultancy, L.L.C. ("R2"), namely, (1) contracts, (2) governing documents, and/or (3) financial records. Plaintiffs move to exclude any and all arguments, evidence, testimony (including expert testimony), and/or references regarding, or inquiries attempting to elicit testimony regarding these documents.

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This motion is made under the provisions of Federal Rule of Evidence and is based upon the supporting Memorandum of Points and Authorities, the pleadings and papers on file in this action, and upon such of the argument and evidence as may be presented prior to or at the hearing of this matter.

Dated: February 7, 2019

Respectfully submitted,

NORTHSTAR AVIATION, L.L.C. and  
NORTHSTAR AVIATION USA LLC

By: DUNLAP BENNETT & LUDWIG PLLC

/s/ Kevin T. Streit

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CERTIFICATE OF SERVICE

I hereby certify that on this, the 7th day of February, 2019, I electronically filed the foregoing with the Clerk of the Court using the Court's CM/ECF system, which will send notification of such filing to the following:

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